

Exhibit D

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

_____	X	
REID BIGLAND,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 19-cv-_____
	:	
FCA NORTH AMERICA HOLDINGS, LLC;	:	
FCA US LLC; FIAT CHRYSLER	:	
AUTOMOBILES, N.V.,	:	
	:	
Defendants.	:	
_____	X	

I, Shavan M. Giffen, hereby declare and state as follows:

1. I am employed by Defendant FCA US LLC as its Assistant General Counsel, Employment Law & Benefits. I have personal knowledge of the facts set forth in this Declaration and, if called upon to testify, I would testify competently to the facts set forth in this Declaration.

2. FCA US LLC has at all times relevant to this case been a limited liability company, organized as such under the laws of the State of Delaware.

3. The sole member of FCA US LLC is FCA North American Holdings LLC, a limited liability company organized under the laws of the State of Delaware.

4. The sole member of FCA North America Holdings LLC is Fiat Chrysler Automobiles N.V., a publically traded company incorporated under the laws of the Netherlands and whose principal place of business is London, England.

5. Fiat Chrysler Automobiles N.V. was incorporated (naamloze vennootschap) pursuant to the laws of the Netherlands on April 1, 2014, and has its principal executive office and headquarters at 25 St. James's Street, London, SW1 A 1HA (United Kingdom).

6. Fiat Chrysler Automobiles N.V. is an independent legal entity under the laws of the Netherlands.

I declare under penalty of perjury of the laws of the United States and the State of Michigan that the foregoing is true and correct, and that this declaration was executed on June 5, 2019 at Auburn Hills, Michigan.


Shavan M. Giffen